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listed separately on next page]

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 NATIONAL CREDIT UNION
ADMINISTRATION BOARD AS
14 LIQUIDATING AGENT FOR WESTERN
CORPORATE FEDERAL CREDIT UNION,
15

16 Plaintiff,

17 vs.

18 ROBERT A. SIRAVO, TODD M. LANE,
ROBERT J. BURRELL, THOMAS E.
19 SWEDBERG, and TIMOTHY T. SIDLEY,

20 Defendants.

21 ROBERT A. SIRAVO, TODD M. LANE,
ROBERT J. BURRELL, THOMAS E.
22 SWEDBERG, AND TIMOTHY T. SIDLEY

23 Counterclaimants,

24 vs.

25 NATIONAL CREDIT UNION
ADMINISTRATION BOARD AS
26 LIQUIDATING AGENT FOR WESTERN
CORPORATE FEDERAL CREDIT UNION,

27 Counterclaim Defendant.
28

CASE NO. CV10-01597 GW
(MANx)

**JOINT STIPULATION FOR
DEFENDANTS/
COUNTERCLAIMANTS TO
FILE AMENDED ANSWERS
AND COUNTERCLAIMS**

Judge: Hon. George Wu

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RECITALS

A. Plaintiff, the National Credit Union Administration Board as Liquidating Agent for Western Corporate Federal Credit Union (“NCUA”) filed a Second Amended Complaint in this action on February 22, 2011.

B. The Answers and Counterclaims of Defendants/Counterclaimants Robert John Burrell, Robert A. Siravo, Thomas E. Swedberg, and Timothy T. Sidley were filed on August 15, 2011.

C. The Amended Answer and Counterclaim of Defendant/Counterclaimant Todd M. Lane was filed on September 2, 2011.

D. Pursuant to this Court’s order issued October 17, 2011 [Docket 181], the NCUA has until November 14, 2011 to file a single motion to strike affirmative defenses and a single motion to dismiss the four Counterclaims or to answer the Counterclaims. The Defendants/Counterclaimants have until December 5, 2011 to file their combined oppositions, and the NCUA has until December 23, 2011 to file its reply papers. The hearing on these motions is set for 8:30 a.m. on January 9, 2012.

E. The parties have met and conferred regarding the NCUA’s intended motions to strike and dismiss, and have agreed that Defendants/Counterclaimants will amend their Answers and Counterclaims in response to some of the issues raised by the NCUA.

F. The parties have further agreed that Defendants/Counterclaimants will file their Amended Answers and Counterclaims on or before October 31, 2011 so that the briefing and hearing schedule for the upcoming motions to strike and/or dismiss may remain as currently set.

G. After the filing of the Amended Answers and Counterclaims, the parties will again meet and confer regarding the NCUA's intended motions.

STIPULATION

Based on the foregoing, NCUA and all Defendants/Counterclaimants through their respective counsel hereby stipulate that the Court may enter an Order in the form attached hereto providing that:

1. Defendants/Counterclaimants shall have until October 31, 2011 to file Amended Answers and Counterclaims.

2. The briefing and hearing schedule on the motion to strike and motion to dismiss shall remain as previously set in this Court's October 17 order [Docket 181]: Motions due on or before November 14, 2011; Oppositions due on or before December 5, 2011; Replies due on or before December 23, 2011, and the hearing set for 8:30 a.m. on January 9, 2012.

DATED: October 26, 2011

MUNGER, TOLLES & OLSON LLP
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Laura D. Smolowe

By: /s/ Richard E. Drooyan
RICHARD E. DROOYAN

DATED: October 26, 2011

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17 Administration Board As Liquidating
18 Agent for Western Corporate Federal
19 Credit Union
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